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E-File: March 5, 2014

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**UNITED STATES BANKRUPTCY COURT**

**DISTRICT OF NEVADA**

In re:

MARTIFER AURORA SOLAR, LLC, a  
Nevada limited liability company,

- ☐ Affects Martifer Aurora Solar, LLC  
☐ Affects Martifer Solar USA, Inc.  
☒ Affects All Debtors

Case No.: BK-S-14-10355-abl  
and BK-S-14-10357-abl

Jointly Administered Under  
Case No.: BK-S-14-10355-abl

Chapter 11

**STIPULATION BETWEEN THE  
DEBTORS AND THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS FURTHER  
EXTENDING THE DEADLINE TO  
OBJECT TO DIP FINANCING  
MOTION**

**[Relates to Docket Nos. 85, 101, 231]**

Hearing Date: March 10, 2014  
Time: 9:30 a.m.  
Place: 300 Las Vegas Blvd. So.  
Courtroom  
Las Vegas, NV 89101

Martifer Aurora Solar, LLC ("Martifer") and Martifer Solar USA, Inc. ("Martifer Solar"), the  
above-captioned debtors (collectively, the "Debtors"), and the Official Committee of Unsecured

Creditors (the “Committee” and together with the Debtors, the “Parties”), through their proposed counsel of record hereby stipulate and agree as follows in accordance with the following facts and recitals:

### **RECITALS**

A. On January 21, 2014 (the “Petition Date”), the Debtors commenced these bankruptcy cases by each filing a voluntary petition under Chapter 11 of the United States Bankruptcy Code.

B. On February 4, 2014, the Debtors filed the Amended Motion for Authority to Obtain Credit Under Section 364(b), Rule 4001(c) or (d) Motion for Order Pursuant to 11 U.S.C. § 364 and Fed. R. Bankr. P. 4001(c): (I) Authorizing Debtors to Obtain Postpetition Financing; (II) Granting Related Relief; and (III) Scheduling Final Hearing [Docket No. 85] (the “Second DIP Financing Motion”).

C. On February 14, 2014 the United States Trustee appointed the Committee. [Docket No. 177]. On February 28, 2014, the Committee retained counsel.

D. On March 3, 2014, the Debtors and the Committee filed that certain Amended Stipulation Between Debtors and Official Committee of Unsecured Creditors Extending the Deadline to Object to DIP Financing Motion and Cash Collateral Motion [Docket No. 273] (the “First Stipulation”).

E. On March 4, 2014, the Court entered an order granting, the First Stipulation, extending, among other things, the Committee’s response deadline to the Second DIP Financing Motion and Interim DIP Order to and including March 5, 2014 at 5:00 p.m. without prejudice to the parties’ rights to further extend this date [Docket No. 280].

F. The parties require additional time to resolve issues raised by the Committee to the Interim DIP Order.

### **SCHEDULING STIPULATION**

**NOW, THEREFORE, IT IS HEREBY STIPULATED** as follows:

1. The Committee’s response deadline to the Second DIP Financing Motion and Interim DIP Order is further extended to and including March 6, 2014 without prejudice to the parties’ rights to further extend this date.

2. The Debtors' reply is extended to and including March 8, 2014.

DATED this 5<sup>th</sup> day of March 2014.

**LARSON & ZIRZOW LLC**

/s/ Matthew C. Zirzow

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